Joint Stakeholder Meeting for
Surface Coating of Miscellaneous Metal Parts and Products
and Surface Coating of Plastic Parts
Meeting Summary - February 4, 1998

1.0 PURPOSE

The following is a summary of the third stakeholders meeting in the maximum achievable control technology (MACT) and volatile organic compound (VOC) regulation development process for both the surface coating of miscellaneous metal parts and products, and plastic parts. The meeting was conducted jointly due to several overlapping issues between the two source categories and an interest by many stakeholders in both projects. An agenda from the meeting is included as attachment A.

2.0 PLACE AND DATE

US EPA Environmental Research Center
Alexander Drive
Research Triangle Park, NC
February 4, 1998
9:00 a.m.

3.0 ATTENDEES

A list of the meeting participants and their associated organizations/companies is included as attachment B. Please review this list. If there are any additions or modifications please notify George Woodall by telephone at (919) 941-0333 or via e-mail at gwoodall@rtp.pes.com, or Greg DeAngelo by telephone at (919) 468-7851 or via e-mail at gdeangel@erg.com.

4.0 DISCUSSION

The topics summarized below are presented roughly in the order in which they were discussed and for the most part, follow the agenda established prior to the meeting. No presumption of the importance of one issue over another has been imposed.

4.1 Introduction and Project Updates

Bruce Moore began the morning session with a brief introduction to the group. He announced that in addition to the Miscellaneous Metals Parts and Products (MMPP) project, he will be acting as the project lead for the Plastic Parts and Products (PPP) surface coating category during the temporary absence of Ellen Ducey. Mr. Moore then presented an overview of the progress of MMPP and PPP since the last joint stakeholders meeting.

Both MMPP and PPP project teams have visited a number of sites since the August 1997 meeting. The MMPP project team has visited a railcar facility, several magnet wire facilities, miscellaneous hardware manufacturers, a curtain wall manufacturing facility, and aluminum extrusion manufacturers. Visits to a Harley Davidson Motorcycle manufacturer and a defense contractor in Pennsylvania are scheduled. The PPP project team has visited a business machine manufacturer and a miscellaneous plastic parts coater, whose primary products are aircraft interior parts. The PPP team is planning to visit more miscellaneous plastic parts manufacturers in the future.

Both MMPP and PPP project teams have been involved in the development of an alternative questionnaire in conjunction with the other surface coating source categories. Both teams have also been engaged in drafting industry profiles and developing a census of facilities for their respective categories.

In addition, the MMPP project team has met with the small business and regulatory issue subgroups since the last stakeholders meeting.

4.2 Information on the Internet

Nancy Pate, of the U.S. EPA, gave a visual presentation of the Industrial Surface Coating Rule (ISCR) development website on the internet. The ISCR development website can be accessed through the UATW (United Air Toxics Website). The UATW was developed by the US EPA in cooperation with state and local air pollution control agencies (STAPPA and ALAPCO). These agencies were in need of a single location to access information pertaining to a particular rule. The UATW is accessible through the TTN (Technology Transfer Network), which was also developed by EPA.

The industrial surface coating rule development web page can be accessed directly using the following address: www.epa.gov/ttn/uatw/coat/coat.html. This page includes a brief introduction to ISCR development, followed by a list of categories with currently active projects.

Each item on this list is a link to the web page for each of the surface coating source categories. The web pages for MMPP and PPP contain sections where announcements, background information, existing requirements, meeting minutes and materials, documents for review, draft PMACT guidance, and ICR information will be posted. The main ISCR development page also provides a section for frequently asked questions. It was suggested that a section for frequently asked questions be added to specific source category pages.

A suggestion was made that the web page containing the links to each surface coating category's individual web page also contain the last date that modifications to that page were made. This will make it easier for browsers to recognize when new information has been posted to a particular category's web page. Hopefully, the internet will be used as a significant and primary communication tool for stakeholders. The intent is to eliminate the need for mass mailing distributions outs and faxes to disperse information to stakeholders. Several stakeholders requested that some form of notification (i.e., a message via e-mail) be sent out to alert them of new postings on the MMPP and PPP web pages. In addition, other stakeholders suggested that important information, such as meeting notices, should be distributed by mail, phone, or fax, and not solely through the websites.

4.3 Data Collection Timetable

An overview of the proposed timetable for collection of data was presented. Tentatively, questionnaires will be mailed to respondents in May 1998, and the collection of responses will be conducted from June through August 1998. An industry representative noted that the SARA Form R reports are due on July 1, 1998. Most industries will be engrossed in completing and returning these reports and probably will not have time to respond to the questionnaire until after July 1. Industry representatives also stressed that they will need the full 90 days allotted to them for response to the questionnaire. It was suggested that questionnaires be distributed in June instead of May and collected from July through September 1998.

Questionnaires will be sent to the owners of facilities specifically, and not through trade associations. Efforts are being made to ensure that facilities who may be subject to more than one surface coating rule only receive one questionnaire. Major sources will not be the only candidates for questionnaire response; all surface coating facilities within a source category will be considered as potential respondents. The major data collection issues are to whom to send

questionnaires, what to ask in the questionnaire, and how to ask for requested information. Stakeholder input will be needed for all of these issues.

4.4 Census of Facilities

4.4.1 Miscellaneous Metals

George Woodall discussed the efforts of MMPP to develop a census of facilities. Generally, there are two basic needs for a census of facilities. It will act as a source for the development of the questionnaire mailing list, and it will aid in the characterization of the source categories. MMPP will be using three main sources of data to compile a census of facilities: the AIRS database, state lists, and trade association lists. These sources are discussed in the paragraphs below.

The AIRS database contains most of the major sources in the country. However, AIRS uses Standard Industrial Classification (SIC) codes to categorize facilities, which is not very useful for MMPP. SIC codes are too inclusive for a thorough characterization of MMPP surface coating facilities. AIRS also contains Standard Classification Codes (SCCs), which is an eight-digit code that classifies facilities by specific processes. All SCCs beginning with 4-02 indicate surface coating operations. AIRS lists more than 1200 MMPP facilities using very specific six-digit SCCs. Codes 4-02-015 for magnet wire, 4-02-015 for miscellaneous metal parts, and 4-02-026 for steel drums all indicate MMPP surface coating operations in a facility. The six-digit SCC for general surface coating operations (4-02-001) will likely include many more MMPP facilities, but also includes facilities for other surface coating source categories.

The collection of data from state agencies to develop a census of facilities is a cooperative effort by all project teams working on 10-year MACT rules for the surface coating source categories. States were selected for data collection based on the perceived importance of the surface coating facilities within that state for the project teams. The MMPP project team has been assigned to IN, NJ, and NY for investigation. A list of the surface coating categories and states they were assigned for data collection was included with the materials distributed for the meeting. It is important to note that each source category will collect information for all source categories in a particular state. Data from NC and PA has already been collected and evaluated to help with the census of facilities. The NC agency uses the I-STEPS database, which mirrors the AIRS data model. Only 26 MMPP facilities were found in the NC database using the SCC criteria discussed

previously; however, AIRS listed more than 26 facilities for NC. A cross reference of the NC state MMPP data with the AIRS data for NC indicated that none of the NC facilities found in the state database are listed in AIRS. Therefore, the data gathered from the state of NC may be combined with AIRS data to formulate a census of facilities list. The PA database did not include SCCs, and since SICs are too inclusive, the data collected from PA does not allow segregation of MMPP surface coating facilities very readily.

The MMPP has composed a letter to trade association stakeholders to solicit help with the census of facilities. This letter requests mailing lists of association members and non-members in the industry. It also asks for names and contacts of other associations that may be affected by the MMPP rule. Stakeholders were asked to submit names of pertinent trade associations not represented in the MMPP stakeholder group to George Woodall.

4.4.2 Plastic Parts

Greg DeAngelo and Heather Wright presented the status of the PPP facility identification database. The PPP project team is developing a facility identification database to serve primarily as a mailing list of facilities that apply surface coatings to plastic parts and products. As discussed at a previous stakeholder meeting, these facilities are identified in AIRS as a union of both SIC codes and SCCs. Mr. DeAngelo began this presentation with a brief discussion of AIRS and explained how the data would be used to supplement the PPP facility identification database. Emissions data in AIRS are very detailed for any particular plant. However, because AIRS does not follow a consistent approach for segment level emissions and identification, the data are not easily summarized by process. As a result, the PPP project team expects to use the gross plant-wide emissions data to help identify major sources along with all of the facility location and identification data (e.g., address, latitude, longitude, and identification numbers). The PPP project team will compare the results of the SIC code and SCC union search with the facility identification data from other sources.

The PPP project team has been compiling the information that they have collected on plastic parts coating facilities into an Microsoft Access™ database, that is being used to organize this data and to develop a mailing list to distribute facility questionnaires. To date, PPP has listed 327 sources in their database; however, this number does not include any information from the AIRS database.

4.5 Alternative Questionnaire

Joan McLean gave a brief description of ICRs. An ICR, or information collection request, is a process between an agency (i.e., EPA) and the Office of Management and Budget (OMB). When EPA wants to collect information from the public, it must request a review and clearance of that information from OMB. This process takes at least six months and is required if more than nine parties are to be surveyed. A generic questionnaire for all MACT standards was developed by EPA and reviewed and cleared by OMB. This survey was devised to be a time saving device, and can be used to develop any MACT standard without further review from OMB. However, because the survey is generic, it is not specific to any particular source category, and many of the questions do not pertain to surface coating operations. It is also too general to extract any detailed information about coating operations from respondents. Therefore, an additional survey, the alternative questionnaire, was developed specifically for surface coating operations. The EPA's intent in designing this alternative questionnaire was to create a survey that would be easier for surface coating facilities to complete than the generic questionnaire. EPA has the option of including this alternative questionnaire with the generic MACT questionnaire. No OMB review will be required as long as the content of the alternative questionnaire does not exceed the scope of the generic MACT questionnaire. Respondents will be given the option to complete either the generic questionnaire or the alternative questionnaire.

George Woodall reviewed the content of the alternative questionnaire; a list of the elements expected to be included was provided as a handout (referenced as attachment C). The questionnaire consists of several sections: general facility information, process line information, process information, stack parameters, pollutant specific information, control device information, and material inputs. General facility information consists of elements such as facility name, location and mailing address, facility description, principal and end-use products, and other important facility information. It includes a tracking number which will be assigned by EPA. It also contains a section for SICs and NAICS codes, and a website address for more information on NAICS codes was provided (www.census.gov/epcd/www/naics.html). This general facility information section also requests the number of facility coating employees, which will be used for an economic impact assessment for rule development. The process line information section collects data for pieces of equipment that operate together. Process information pertains to individual pieces of equipment. The control devices section will be very important, especially for

larger sources who currently use add-on control methods. Information on each individual pollutant will be collected in the emissions information section. The process material input section basically requests information on the amount of coatings used in a process facility at the greatest level of detail available. Stakeholders agreed that most facilities maintain emissions data or coating usage data on a per-facility basis as opposed to a per-line or per-booth basis. There were also questions as to whether stack-specific information would be relevant. It was stated by EPA that the list of data elements is currently being developed, and that the information provided in the handout is basically for discussion purposes only.

It is anticipated that a draft of the alternative questionnaire will be sent out to stakeholders for review before the next stakeholders meeting and will be the general focus of that meeting. The format of the alternative questionnaire has yet to be determined. The respondent burden of the questionnaire will likely be assessed using a pilot of the survey. Stakeholder input will be needed on the format of the alternative questionnaire and on the pilot survey. Written comments on content of the alternative questionnaire will be greatly appreciated and should be submitted to George Woodall or Greg DeAngelo by February 20. Stakeholders will also have the opportunity to comment on the actual questionnaire once it becomes available.

4.6 ICR for Coating Suppliers

The EPA explained the objective of surveying industry. The survey results are used to populate a MACT floor database and to determine the MACT floor. The EPA wants to ensure that the data collected through the surveys will support the analysis needed to set MACT standards. The MACT standards can consist of many different regulatory formats. Some possible types of standards are hazardous air pollutant (HAP) and VOC content limits, coating technology standards, add-on control technology standards, work practice standards, and combination and alternative standards. Information gathered from surveys must be thorough and complete enough to allow EPA to determine which format is best for the MACT standard.

In conjunction with questionnaires that will be sent to coating users, EPA is investigating if information can also be obtained from coating suppliers. This coating suppliers survey would serve as a source of information, on specific HAP and VOC contents, percent solids, and other detailed information, that users may not know. While many larger companies have formulation data for the coatings that they use, many smaller businesses may not have this information.

Material Safety Data Sheets (MSDSs), which are frequently used for reporting, do not provide enough detail for rule development. In particular, MSDSs do not always provide speciated contents, and they often report contents as broad ranges (e.g., 10 to 60 percent by volume). Coaters expressed strong concern about EPA receiving information about coatings from their suppliers. Many paints are remixed and reformulated at the coating facilities, so the formulations from suppliers will not represent what is actually used to coat a product.

Coating suppliers present stated that a coating suppliers survey would likely result in a flood of data requiring too much analysis to be of any use. It was then suggested that coating users (facilities) provide any data that they have on the VOC and HAP components in the coatings they use. If this information is not available, coaters would supply the names of the manufacturers of their coatings and the product identification/stock numbers of their coatings. EPA would then ask the coating suppliers for only the information not provided by the coating users. This would reduce the amount of information requested from coating suppliers by EPA. A representative of small business stressed that a coating supplier survey would be beneficial to most smaller companies. Smaller manufacturers have limited resources and have to rely on MSDSs as a source of information on coatings. A concern was expressed that using coating suppliers as a source of reporting information would introduce inconsistencies in EPA reports; information for a given facility reported to EPA for MACT standards would be different than information reported to EPA for SARA for identical constituents and parts. The EPA noted that such differences would not be problematic or have any compliance ramifications. Information obtained from the coating suppliers survey would be linked with information obtained from the coating users questionnaire through the use of the manufacturers' product identification codes.

The coating supplier survey will be an additional approach to collect information on coatings and will not be used in place of the alternative questionnaire. No facility specific usage data will be gathered from the suppliers survey. Suppliers noted that numerous formulations of one type of coating may be manufactured for the same product line. For instance, each color of a particular coating has its own formulation. Since the coating industry is highly customized, many coating suppliers may be reluctant to reveal their proprietary formulations. A suggestion was made that surveys request only complete information on HAP and VOC content, not complete formulation details. Stakeholders were assured that surveys will be given the same level of

confidentiality as confidential business information (CBI). The OMB approval may be necessary for the coating suppliers survey.

4.7 Afternoon Session Covering Specific Technical Subjects

The afternoon session of the meeting consisted of discussion and questions on three specific technical subjects: (1) inclusion of adhesives applications in the coating rules; (2) overlap with the auto and light duty truck rules and the aerospace industries rules; and (3) treatment of specialty coating categories. These topics are relevant to both the miscellaneous metal parts and plastic parts source categories. The EPA encouraged stakeholders to submit written comments or information on these topics. Concise technical memoranda or letters are an effective way to provide information for EPA's consideration.

4.7.1 Adhesives Application Operations

The EPA pointed out that adhesives application operations are included in the scope of several existing coating rules and are being considered for inclusion in the coating MACT and 183(e) rules currently being developed. For miscellaneous metal parts and plastic parts, EPA's current approach is to continue to collect information about adhesives applications to assess the magnitude of emissions. No decision has been made as to the how adhesives might be regulated.

In considering regulation of adhesives application, questions arise regarding applicability. Adhesives might be applied to plastic or metal parts in any of three general scenarios.

- In a single facility, adhesives are applied to parts that are also painted.
- In a single facility, certain parts are coated with adhesives only, while other parts are coated with paint only.
- A facility includes adhesives application operations for plastic or metal parts, but does not perform any painting of plastic or metal parts.

The EPA asked for comments and discussion on the these scenarios and how likely they are to occur in particular industries. In general, it appears that all three scenarios do occur. Stakeholders expressed concern that adhesives are as varied and numerous as paints, and that their contents are as complex. Some adhesives also require special primer coats. Therefore,

separate standards may be needed for adhesives. Regulating paints and adhesives as a single source category may not be practical.

Stakeholders asked whether sealants and caulks would be included as adhesives. Bruce Moore responded that they were included at this point in the information gathering activities. A representative of the Adhesives and Sealants Council (ASC) was present (by phone) and commented that the ASC was following rule development.

Stakeholders also asked how cleaning solvents and operations would be covered under the rulemakings. Bruce Moore noted that cleaning, like adhesives and caulks, was being included in the information gathering activities.

4.7.2 Overlap Issues

The focus of the overlap discussion was the auto and light duty truck and the aerospace source categories. The EPA is currently developing regulations for the auto and light duty truck source category under sections 112 and 183(e). The MACT standard for the aerospace industry has been promulgated (40 CFR part 63, subpart GG), and a Control Techniques Guideline (CTG) has been published for aerospace coatings. To access overlap concerns, cases where a single coating or a single operation might be regulated by more than one rule must be identified.

The auto and light duty truck source category is intended to address coating operations that are part of the assembly line. The plastic parts and miscellaneous metal parts source categories are intended to cover coating that occurs offline. The EPA is focusing on situations where a part receives some paint offline (e.g., a primer) and then is further coated on the assembly line. The offline coating could occur either at a separate facility, or in a coating booth at the assembly facility that is not part of the main paint shop. In addition, it was noted that coatings applied offline must be compatible with subsequent coats, and in some cases the colors must be matched. Stakeholders also pointed out that touch-up coating occurs on the assembly line and should not be considered an offline operation.

The aerospace national emission standard for hazardous air pollutants (NESHAP) provisions explicitly exclude parts that are “not critical to the vehicle’s structural integrity or flight performance.” Metal or plastic airplane parts not covered by the aerospace rule or CTG would be subject to the miscellaneous metal parts or plastic parts rules. These would consist primarily of interior parts. A stakeholder asked how EPA would treat advanced composite materials. Bruce Moore stated that EPA has not addressed this issue yet. Stakeholders agreed that aerospace

coatings are also affected by Federal Aviation Administration (FAA) regulations. For example, airplane parts are required to meet smoke and combustion standards for an entire assembled part (e.g., a chair), including all of the component materials, coatings, and adhesives.

Stakeholders noted that aerospace manufacturing consists largely of final assembly of products supplied by many smaller contractors. Large scale coating may not take place at aerospace assembly plants, unless that plant has rebuild or remanufacture capabilities. A possible overlap issue involves a contractor that makes and coats part that may be included in several final products, such as a coated bolt or fastener that can be used on a snowmobile, washing machine, or aircraft interior.

4.7.3 Specialty Coatings

The EPA described specialty coatings as coatings that are considered separately from the general coating type that they belong to. Certain coatings might be considered separately because they are used in significantly smaller quantities, or because they have special performance criteria such as corrosion protection or safety considerations. Specialty coatings could be given separate standards, or they might be exempt. In some cases, the use of specialty coatings can be accommodated with alternative compliance methods. For example, if a HAP content limit is set for primers, but some primers have a particular safety performance specification that requires a higher solvent content, facilities might be allowed to apply the higher HAP-content coating as long as they control the emissions with an incinerator. The EPA asked the stakeholders for suggestions of potential specialty coating categories. The suggestions included:

- Department of Defense (DOD) combat coatings,
- DOD Nuclear-Biological-Chemical (NBC) protective and identification coatings,
- Potable water supply coatings,
- Food and Drug Administration (FDA) regulated coatings,
- Department of Transportation (DOT) National Traffic Highway Safety coatings; and
- Other speciality coatings as described in the Plastic Parts ACT document.

A stakeholder suggested that, in most cases, designating specialty coatings would not be necessary since advanced and innovative low-HAP and low-VOC technologies exist to meet most coating needs. The EPA responded that the process of setting MACT standards is designed to identify such technologies and, where appropriate, to set standards based on them.

The EPA requested written information on specialty coatings. Submittals should include a clear technical definition of the suggested coating type and a technical basis for specialty status, including data where relevant.

Attachment A

Agenda
Joint Third Stakeholders Meeting
Miscellaneous Metal Parts and Products
and
Plastic Parts Surface Coating

Wednesday, February 4, 1998 from 9 a.m - 4 p.m. (EST)
Class Room No. 1 at the Environmental Research Center
Research Triangle Park, NC

9:00	Introduction	-	Bruce Moore
9:10	Information on the Internet	-	Nancy Pate
9:30	Data Collection Timetable	-	Bruce Moore
9:35	Census of Facilities • AIRS (List of Major Sources) • Trade Associations • Letter seeking cooperation • State Data	-	George Woodall & Joan McLean
10:00	Break		
10:15	Alternative Questionnaire • Content (types of information requested) • Format • Respondent Burden • Stakeholder Input Needed	-	George Woodall
11:15	ICR for Coating Suppliers	-	Joan McLean
11:30	Closing of Morning Session • Next MMPP Stakeholders Meeting • Next MMPP Issue Subgroups Meetings	-	Bruce Moore
12:00	Lunch		
1:00	Adhesives Application: Discussion of inclusion of adhesives application under the MACT and VOC regulations	-	Joan McLean
1:30	Overlap Issues • Auto and Light Duty Truck Category • Aerospace NESHAP and CTG • Discussion and solicitation of technical memoranda	-	Joan McLean
2:00	Specialty Coatings • Criteria for specialty status • Possible regulatory formats • Discussion and solicitation of technical memoranda	-	Joan McLean
2:15	Adjourn		

Attachment B

Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List

NAME	SOURCE CATEGORY	AFFILIATION AND ADDRESS	PHONE/FAX	E-MAIL
Appleman, Bernard	MMPP Only	SSPC: Society for Protective Coatings 40 24th Street, 6th Floor Pittsburgh, PA 15222	412-281-2331 412-281-9992 (F)	appleman@sspc.org
Berry, Jim	MMPP & Plastic Parts	Berry Environmental (Representing ASTM) PO Box 20634 Raleigh, NC 27619	919-785-9631 919-785-9631 (F)	jimberryec@aol.com
Bryant, Chris	MMPP Only	KY Department of Environmental Protection Air Pollution Control District of Jefferson County (STAPPA-ALAPCO Representative) 850 Barret Avenue Louisville, KY 40204	502-574-6000 502-574-5306 (F)	
Bryant, Mike	Plastic Parts Only	Eastern Research Group (ERG) PO Box 2010 Morrisville, NC 27560	919-468-7839 919-468-7801 (F)	mbryant@erg.com
Butler, Bob	MMPP & Plastic Parts	PACCAR Inc. PO Box 1518 Bellevue, WA 98009	425-468-7435 425-468-8213 (F)	
Cannon, Dick	MMPP Only	Jones Blair Company 2728 Empire Central PO Box 35286 Dallas, TX 75235	214-353-1686 214-353-1684 (F) OR 214-350-7624 (F)	jbdirec1@flash.net OR dcannon@jones-blair.com
Compton, Bill	MMPP & Plastic Parts	Caterpillar Inc. Corporate Environmental Affairs 100 NE Adams Street Peoria, IL 61629-3315	309-675-4105 309-675-6364 (F)	
Craner, Francis	MMPP Only	NY Department of Environmental Conservation Division of Air Resources 50 Wolf Road, Room 108 Albany, NY 12233	518-457-7688 518-485-8427 (F)	fxcraner@gw.dec.state.ny.us
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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Goozh, Paul	MMPP & Plastic Parts	NASA Headquarters Code JE Washington D.C. 20546-0001	202-358-1414 202-358-2861 (F)	pgoozh@hq.nasa.gov
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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Kruzer, Marc	MMPP & Plastic Parts	Sherwin Williams 101 Prospect Avenue, NW Cleveland, OH 44115	216-566-6546 216-566-2508 (F)	mskruzer@sherwin.com
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Lilly, Amy	MMPP & Plastic Parts	Association of International Auto Manufacturing 1001 North 19th Street, Suite 1200 Arlington, VA 22209	703-525-7788 703-525-8817 (F)	alilly@aiam.org
Lutterbach, Mark	MMPP & Plastic Parts	Red Spot Paint PO Box 418 Evansville, IN 47703	812-428-9131 812-428-9167 (F)	
Madigan, Sean	MMPP Only	Honda of America Manufacturing, Inc. 19900 SR 739 Marysville, OH 43040	937-644-0727 (x0890) 932-645-8267 (F)	m0013795@honmfg.com

Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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McDaniel, Tim	MMPP & Plastic Parts	Navistar (TMA) 6125 Urbana Road Springfield, OH 45502	937-390-4024 937-390-4501 (F)	sueiu@bright.net
McLean, Joan	Plastic Parts Only	Eastern Research Group (ERG) PO Box 2010 Morrisville, NC 27560	919-468-7861 919-468-7801 (F)	jmclean@erg.com
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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Miscellaneous Metal Parts and Products/Plastic Parts Meeting Participant List (Continued)

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Attachment C

[A reference to the docket number for the original meeting notes will be added. Attachment C is handouts at the meeting.]